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December 31, 2018

Via ECF

Honorable Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Francis v. General Revenue Corporation*
Case No. 18-cv-06955 (BMC)

Dear Judge Cogan:

This firm was recently retained to represent Defendant General Revenue Corporation (“GRC”) in the above captioned matter. GRC respectfully requests an extension of time to answer, move, or otherwise respond to the Complaint, making the new deadline January 30, 2019.

The current deadline for GRC to respond to the Complaint is January 2, 2019. Counsel for Plaintiff, Daniel Zemel, consents to this request. There have been no previous requests for an extension of time to respond to the Complaint by GRC. The requested extension does not affect any other scheduled dates or deadlines. GRC is requesting the extension so that it has time to review Plaintiff’s allegations and investigate Plaintiff’s claims.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

PAG/cg

cc: All Counsel of Record (via ECF)

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